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C.V. 1 ADDN NO. 4:11-CV-3362-TLW
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12-5-12
UNITED STATES DISTRICT COURT
TERRY L. WOOTEN
U.S. DISTRICT JUDGE
OF SOUTH CAROLINA

Thomas Reginald Brooks
Plaintiff,

vs.

County of Richland South
Carolina, et al
SOUTH CAROLINA DEPARTMENT
OF CORRECTIONS, et al
Defendants,

MOTION FOR Special Inter-
locutory ORDER to Intervene
IN Collateral MATTER OR
BASES CONCERNING Grounds
IN ABOVE CIVIL ACTION
PENDING.

HERE is all Grounds of Facts, Supposition, and
~~being~~ the plaintiff is enclosing a motion drafted
by his p.c.2., atty., on JUNE 21, 2012, whom is Robert
T. Strickland, atty., with in "Barnes, Alford, Stark &
Johnson, LLP". The Grounds for this JUNE 21st 2012, mo-
tion was for "Motion for Leave To Conduct Discovery"
on July 19th 2012, after a hearing before The Honorable James
R. Barber III, presiding judge, Fifth Judicial Circuit. As
of today's date of 09-10-2012, Grounds 5 thru 7, have not
been disclosed to the atty., representing me in this past
conviction matter. PER my atty., my p.c.2. hearing is
scheduled for Sept. 14th 2012, at the "Richland County
Judicial Center", on Main St., in downtown Columbia, in
the Court of Common Pleas for Richland County.

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With a "prima facie" showing of The Honorable's ORDER Granting discovery their or reasonable facts and ~~beliefs~~ ^{beliefs} that the state is attempting to violate ~~petitioners~~ ^{petitioners} rights pursuant to "Brady v. Maryland," and cover up the facts concerning the Applicant's grounds for disclosure of Grounds 3 thru 7, The plaintiff's Grounds for current motion for Special Interlocutory order to intervene in what is a obvious conspiracy and attempt to withhold evidence that is material in all phases of my rights to due process rather Criminal and or C.V.I. ~~The~~ ^{The} withheld and or tampering and or destruction of material evidence that tends to exculpate a defendant in a Criminal proceeding and or ^{etc.} ~~impugn~~ ^{impugn} a witness against the defendant is a Criminal act of Conspiracy etc., and tends to pollute the demands for Justice and bring the admin. of Justice in-to turmoil. This information is needed to comply with the burden of proof required for the plaintiff to overcome the burden for the Grounds of p.c.i.r., at this First Collateral mode of ~~prob.~~ ^{prob.} How can the ~~Applicant~~ ^{Applicant} have the fair bite of the legal apple at this important stage to Then as a plaintiff in this civil action

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have the safeguards of the Constitution such as for example to defend against any defense by the state at the doctrine of Collateral estoppel; ^{etc} if he is prejudiced ~~and~~ and limited ~~for~~ establishing the requirements of Strickland v. Washington, supra; State v. Gibson, supra etc. The plaintiff per se, asks and the destruction of the Court with mercy to intervene in this matter to conduct discovery for the purpose of Civil Action number 4:11-CV-3362-TLW. With all due respect to the jurisdiction ~~of~~ the Court and the ethics involved as a matter of justice and providing interests to the pending matter of Civil Action Number 4:11-CV-3362-TLW, did the same grounds stated in P.C.R. Civil Action No. 2011-CP-40-7395, ^{etc} to establish the plaintiff's immunities to frivolous defenses such as the abated Statute of Limitations etc. The Plaintiff, motions with all due respect and prays that this matter is addressed with the proper and best course that the law provides the people against the hands of corruption and illegal acts of Criminal activity by persons clothed with authority under color of state law. Finally, IN GOD WE TRUST ~~Respectfully~~

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~~Admitted~~ Admitted.

Respectfully,
James Reginald Brooks
09-11-2012